REMARKS

Claims 1-20 are all the claims presently pending in the application. New claims 15-20 have been added to more completely define the invention and which also recite the gist of the invention.

It is noted that the claims have been amended solely to more particularly point out Applicant's invention for the Examiner, and <u>not</u> for distinguishing over the prior art, narrowing the claims in view of the prior art, or for statutory requirements directed to patentability.

Attached hereto is a marked-up version of the changes made to the claims by the currently Amendment. The attached pages are captioned "**Version with markings to show changes made**".

Claims 1-14 stand rejected under 35 U.S.C. § 102(b) as being unpatentable over Yung (U.S. Patent No. 4,961,224) (hereinafter "Yung").

This rejection is respectfully traversed in view of the following discussion.

I. THE CLAIMED INVENTION

Applicant's invention, as defined for example in independent claim 1 (and substantially similarly in independent claims 11 and 14) is directed to file manager for managing a plurality of files and locating a file from among different versions of a same file.

A feature of the present invention is a table for associating the file with a priority list of physical units and where the physical units store a plurality of versions of the file. With such a feature, duplication of a file is avoided and several versions of a file with a common logical identification can be saved (e.g. see page 3, lines 7-11 and page 6, lines 2-12).

An exemplary configuration of the file manager and method of using a file manager to locate different versions of a file all having the same path referring to a same logical unit and a same identifier are shown in Figs. 1-2 of the application.

The conventional network systems and methods, such as those discussed below and in the Related Art section of the present application, do not have such a structure, and fail to

provide for such an operation.

Indeed, such features are clearly not taught or suggested by the cited reference.

II. THE PRIOR ART REFERENCE

A. The Yung Reference

The Examiner asserts that:

> *[With respect to claims 1, 11 and 14] Yung discloses the file manager (file server. computer C3, FIG. 1; col. 4, lines 13-17; col. 3, lines 27-32 and col. 9, lines 55-57) provided for locating a file (col. 4, lines 19-22) identified by a path referring to a logical unit and an identifier (30. header, FIG. 2, directory, col. 4, lines 46-50). comprising: table (16, access log, FIG. 2 and col. 4, lines 13-16) for associating the file with a priority list (col. 4, lines 37-42) of physical units, see (col. 4, lines 46-57).*

However, Applicant respectfully disagrees. That is, Yung is completely different from the claimed invention.

The present invention may include a file manager routing the request by users to access a same file, to different versions of the file. More particularly, the request by users to access a same file may be routed to versions of the file having the same path name but located on different physical units storing a plurality of versions of the file.

In complete and fundamental contrast to the claimed invention, Yung discloses an access procedure performed by computing devices requesting simultaneous conflicting access to the same resource. The effect of the access procedure of Yung being to delay the access by the computer devices having a lower priority access.

The conventional prior art reference of Yung, relied upon by the Examiner, discloses in Figs. 1 and 5, a method to manage conflicting accesses of multiple computer devices C1, C2, C3 to the same resources R1, R2, R3 through a communication channel 14. One resource is a disk storage and contains an access log 16 for logging the requests.

According to an access procedure of Yung each computing device reads, updates the

access log on the disk storage, and delays a request until a priority level authorizes the

request. In order to avoid multiple access to the same location on the disk storage containing

the access log, the access log is duplicated on individual storage units. With the structure of

Yung, each computing device is updating a dedicated access log and sending messages to

update the other access logs to maintain them identically. In Yung, the access logs are

duplicated but the same resources are accessed and each computing device knows its level of

priority.

In the present invention, an object in a non-limiting embodiment, is to add a file

manager (e.g., for example to the operating system of a computer) which, upon reception of a

request from a user to access a file, is able to switch (e.g., transparently to the user) an access

to a different version (e.g., new version) of the file. This is accomplished according to a

priority list updated by an administrator (e.g., see page 6, line 17 to page 7, line 4 of the

specification).

The file manager is able to operate transparently to the user because the file logical

path name from the user, including the file name itself, may always be the same. The file

manager may only change the physical unit as listed in the prioritized list. This feature allows

the creation of a plurality of versions of a file and also permits the re-routing of subsequent

accesses to the file to a specific version of the file according to the updated priority list.

Through changing the priority list, the administrator can switch an application file

library to restore a previous version in a backup operation should there be a problem with a

newly installed application program. The file manager administrator may maintain a priority

list table for the file manager to indicate the physical units to be assigned and a priority of

assignment. Similarly, the file manager of the present invention may assign attributes to the

different version files.

Further, the file versions managed by the file manager correspond to a same logical

file path in the system. All the versions of a same file have the same logical path name but

may be implemented on different physical units. In the invention, the file manager assigns

the physical unit according to the priority list.

Thus, as described above, the objects and solutions of Yung and the claimed invention

are entirely different. That is, in the conventional art of Yung, the access procedure is performed <u>by each computing device which knows its priority level</u>, and <u>all the computing devices access the same resource</u>. The access log (e.g., or the duplicated access logs) is maintained and used by the computing devices.

In contrast, in the present invention <u>the file manager, may for example, handle the management of the file versions and own the priority information</u>. The file manager manages different versions (e.g., transparently to the user and transparently to the other components of the operating system on which it is operating).

As described above, the objects of the present invention and those of the conventional art of Yung are entirely different and thus their respective solutions are entirely different.

As clearly defined by independent claim 1, in a non-limiting embodiment of the present invention, a file manager includes a table for associating a file version to a request to access the file in accordance with a priority list of physical units. That is, <u>assigning a version of a file may include assigning a physical unit to a same named file</u>. As described above, such a method and association is neither taught nor suggested by Yung.

Further, as clearly defined by dependent claim 2 in a non-limiting embodiment of the present invention, the priority list is updated (e.g., for example by using a user interface of the file manager). In contrast to the structure and method of Yung, <u>the priority list of the present invention may only be known and used by the file manager</u>.

Also, as defined by dependent claims 3-4 in a non-limiting embodiment, the file manager may maintain a list of attributes and each file version may have a specific attribute.

Further, as defined by claim 5 in a non-limiting embodiment, a file manager interface may be used to update the attributes. The file manager, may be part of the peripheral device controller (e.g., as defined by dependent claim 6) or part of the operating system in addition to the standard file manager (e.g., as defined by dependent claim 7).

As noted above, the objects and solutions of the present invention and Yung are in complete contrast which is not surprising given that the problems addressed are also entirely different. For example, the problem of Yung is to manage conflicts of access to the same resource <u>by delaying a requester having the lowest priority</u>. In the present invention, a problem addressed, in a non-limiting embodiment, is how to create and reroute to different

versions of the same file transparently to the user. Yung completely fails to anticipate or suggest a solution to such a problem, let alone the novel and non-obvious file manager and method for locating a file of the present invention.

Hence, turning to the clear language of independent claim 1 (and substantially similarly of independent claims 11 and 14), there is no teaching or suggestion of *"[a] file manager provided for locating a file identified by a path referring to a unit and an identifier, comprising:*

>*a table for associating said file with a priority list of physical units,*

>*wherein said physical units store a plurality of versions of said file"* (emphasis Applicant's).

For the reasons stated above, the claimed invention is fully patentable over Yung.

Additionally, dependent claims 2-10 and 12-13 when combined with their respective independent claims define additional novel and non-obvious features.

Further, new 15-20 have substantially similar novel and non-obvious features.

Further, the other prior art of record has been reviewed, but it too, even in combination with Yung, fails to teach or suggest the claimed invention.

III. FORMAL MATTERS AND CONCLUSION

Submitted herewith is a Submission of Corrected Formal Drawings for Figures 1-2. Please substitute these drawings for the drawings that were filed with the Application on January 28, 2000.

In view of the foregoing, Applicant submits that claims 1-20, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: _1/2/02_

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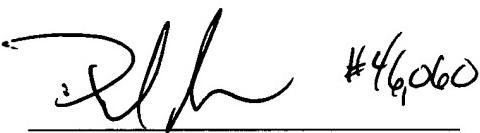
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<u>**VERSION WITH MARKINGS TO SHOW CHANGES MADE**</u>

<u>**IN THE CLAIMS**</u>:

The claims have been amended as follows:

1   1. (Amended) A file manager provided for locating a file identified by a path referring to a

2   unit and an identifier, comprising:

3   a table for associating said file with a priority list of physical units,

4   <u>wherein said physical units store a plurality of versions of said file.</u>

1   11. (Amended) A file manager for locating a file, comprising:

2   a table for associating said file with a priority list of physical units,

3   wherein said file is identified by a path referring to a logical unit and an identifier, <u>and</u>

4   <u>wherein said physical units store a plurality of versions of said file.</u>

1   14. (Amended) A method for locating a file identified by a path referring to a

2   logical unit and an identifier, comprising:

3   associating, in a file manager having a table, said file with a priority list of physical

4   units,

5   <u>wherein said physical units store a plurality of versions of said file.</u>

The following new claims have been added.

1   -- 15. The file manager, as claimed in claim 1, wherein when a second request for a file

2   logical path name and a file name is the same as a first request, said file manager associates a

3   physical unit listed on said priority list to said file name of said second request different from

4   a physical unit associated with a file name of said first request.

1   16. The file manager, as claimed in claim 1, wherein said table comprises a plurality of

2   associations of a same file logical path name and a file name in a one-to-one correspondence

3   with a plurality of physical units.

1   17. The file manager, as claimed in claim 16, wherein said file manager selectively accesses

2   a first association of a same file logical path name and a file name established prior to a

3   second association of a same file logical path name and a file name.

1   18. The file manager, as claimed in claim 1, wherein said file manager routes a subsequent

2   request to access a same file logical path name and a same file name as a previous request to

3   a different version of said file logical path name and said file name on a different physical

4   unit.

1   19. The file manager, as claimed in claim 1, wherein said file manager establishes and

2   maintains said priority list of physical units.

1   20. The file manager, as claimed in claim 1, wherein each of said physical units holds a

2   different version of said file. --